

February 27, 2003

Mary L. Cottrell
Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: DTE 03-6, Boston Edison Co., Cambridge Electric Co. and Commonwealth Gas Co.

Dear Secretary Cottrell:

Enclosed please find in the above captioned matter:

- 1) an original and four (4) copies of Comments of the Town of Winchester, Massachusetts; and
- 2) an original and five (5) copies of the Town's Motion for Limited Participation and For Leave to File Late.

Copies have also been served on counsel for the companies. An electronic version will be separately filed with the Department.

Thank you for your attention to this matter.

Very truly yours,

Brian F. Sullivan
Town Manager

Enclosures

Cc: Andrew O. Kaplan, Esq.
William August, Esq.

BEFORE THE
THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. 03-6)
Boston Edison Company, Cambridge Electric)
Company and Commonwealth Electric Company)
Review by DTE of Demand-Side Management)
Performance Measurement Reports)

MOTION FOR LIMITED PARTICIPATION AND
FOR LEAVE TO FILE COMMENTS LATE

The Town of Winchester, Massachusetts is substantially and particularly affected by NSTAR demand-side management (DSM) energy conservation practices and performance, as the Town is in the process of seeking to implement various DSM measures in Winchester. The Town is therefore substantially and particularly affected by DTE oversight of DSM and will be substantially and particularly affected by DTE maintaining and increasing performance review of NSTAR DSM. Further, serious Town energy outages precipitated increased Town concern about both DTE and NSTAR augmenting DSM performance measurement and oversight. The Town therefore requests that the DTE grant it limited participant status for purposes only of filing the attached comments and receiving copies of filings in this docket.

The Town moves for leave to file the attached Comments late and states the following as grounds therefore. The notice in this docket was not received by the Town until February 12, 2003, and municipal agenda scheduling made it necessary for the Town to act on the Notice after the February 21, 2003 Intervention deadline. Indeed, the Town acted diligently and expeditiously to act on the notice and file comments within the short time frame. Most importantly, the motion for leave to file late is only for the purposes of filing general comments supporting increased DSM oversight and such filing cannot in any way delay the proceedings. Likewise, copying the Town and its counsel will in no way delay the proceedings. Further, the comments are supportive merely of continuing and augmenting DTE oversight and the lateness of the filing is minimal. Wherefore the Town prays that it be granted leave to late file comments as well as limited participant status.

Respectfully submitted,

The Town of Winchester
By: Its Town Manager

Dated: February 27, 2003

Brian F. Sullivan

CERTIFICATE OF SERVICE

I, Brian F. Sullivan, Town Manager, do hereby certify that I caused service of the above filed Motion for Limited Participation and for Leave to File Late to be served upon Andrew O. Kaplan, Esq., Counsel for the above-captioned companies, by first class mail, this 27th day of February, 2003.

Brian F. Sullivan, Town Manager

BEFORE THE
THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. 03-6)
Boston Edison Company, Cambridge Electric)
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COMMENTS OF THE TOWN OF WINCHESTER, MASSACHUSETTS

The Town of Winchester, Massachusetts urges the Department of Telecommunications and Energy to maintain strict standards with respect to review of Demand-Side Management (DSM) Performance Reports, and to greatly intensify measures to augment NSTAR DSM performance, and states the following as reasons therefore:

Dramatic increases in energy costs are negatively affecting the fiscal constraints now facing Massachusetts municipalities and the economy as a whole. As a result of rising energy costs and the financial impact, and as a result of recurring energy outages in Winchester, the Town of Winchester has met with NSTAR energy conservation specialists to commence development of demand-side management programs for Winchester municipal buildings. The Town of Winchester finds that continuation and expansion of such NSTAR DSM programs are important and beneficial to the Town, and the Town therefore finds that it is in the public interest for DTE to implement close scrutiny of DSM performance, to ensure maximum results. The Town finds that DSM measures will yield savings to consumers, the Town and NSTAR and the savings from the DSM measures will pay back the costs of implementing the DSM measures in reasonable periods. Accordingly, the DTE review of performance and the subsidy level for implementing DSM measures should be maintained or increased to broaden participation.

Notwithstanding the benefits of the NSTAR DSM program, the Town of Winchester is concerned that municipal facilities managers and residents may not receive adequate information about the availability of savings from energy conservation. The Town of Winchester recommends that DTE's performance review include evaluation of NSTAR outreach to proactively expand utilization of conservation measures.

Urgent energy supply problems in the Town of Winchester in the summer of 2002 heightened Town interest in DSM and energy conservation. The Town suffered several outages, which posed potential threats to safety and property. The Town experienced difficulty obtaining systematic, clear technical information laying out all the causes of the outages, however, the Town acknowledges receiving good cooperation from NSTAR in

its efforts to piece together certain technical information concerning the outages. Because of the potential grave risks that can result from energy outages, the Town finds that efforts to reduce energy consumption, particularly DTE review, promotion and expansion of DSM programs, are necessary at this time. Needless to say, the broader problems of health risks from environmental pollution and excessive dependence on foreign energy supplies, also provide grounds for policy makers to take all reasonable measures to expand Demand Side Management with respect to municipal, residential and commercial energy consumption.

In light of the foregoing, the Town requests DTE's strict scrutiny of NSTAR performance measurement reports and the Town requests DTE to take seriously the need to expand DSM activity throughout the Commonwealth. As owners and managers of multiple buildings, municipalities can be excellent partners in the DSM process. The Town of Winchester would be happy to explore participation in municipal DSM projects with either DTE or NSTAR.

The Town of Winchester
By its Town Manager:

Brian F. Sullivan dated: 2.27.03

CERTIFICATE OF SERVICE

I, Brian F. Sullivan, Town Manager, do hereby certify that I caused service of the above filed comments to be served upon Andrew O. Kaplan, Esq., Counsel for the above-captioned companies, by first class mail, this 27th day of February, 2003.

Brian F. Sullivan, Town Manager